

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE: ARC AIRBAG  
INFLATORS PRODUCTS  
LIABILITY LITIGATION

MDL No. 3051

Case No: 1:22-MD-3051-ELR

District Judge Eleanor L. Ross

**SPECIALLY APPEARING DEFENDANTS DR. ING. H.C. F. PORSCHE  
AG AND BAYERISCHE MOTOREN WERKE AG’S UNOPPOSED  
MOTION TO EXTEND THEIR TIME TO RESPOND TO PLAINTIFFS’  
MOTIONS FOR JURISDICTIONAL DISCOVERY**

Specially Appearing Defendants Dr. Ing. h.c. F. Porsche AG (“Porsche AG”) and Bayerische Motoren Werke AG (“BMW AG”) hereby move, unopposed, to extend their time to respond to Plaintiffs’ motions for jurisdictional discovery (ECF Nos. 309 & 311) by one week to February 28, 2025. In support thereof, they state as follows:

1. On December 19, 2024, Porsche AG and BMW AG each moved to dismiss Plaintiffs’ Corrected Consolidated Class Action Complaint for, among other things, lack of personal jurisdiction. *See* ECF Nos. 287 & 289.
2. The Court approved the following briefing schedule governing Porsche AG and BMW AG’s motions to dismiss (*see* ECF No. 284):

<b>Event</b>	<b>Deadline</b>
Defendants' Motions to Dismiss	12/19/2024
Plaintiffs' Oppositions	2/7/2025
Defendants' Replies	2/28/2025

3. On February 7, 2025, Plaintiffs filed their oppositions to Porsche AG and BMW AG's motions to dismiss. ECF Nos. 308 & 310.

4. On the same date, Plaintiffs also filed motions to take jurisdictional discovery against Porsche AG and BMW AG. ECF Nos. 309 & 311.

5. According to the Court's briefing schedule, Defendants' replies in support of their motions to dismiss are due on February 28, 2025. *See* ECF No. 284. Their oppositions to Plaintiffs' motions for jurisdictional discovery, however, are due one week earlier, on February 21. *See* L.R. 7.1(B) (providing fourteen days to respond to a motion).

6. Plaintiffs' oppositions and motions to take jurisdictional discovery raise largely similar subject matter and numerous overlapping issues. *See, e.g.*, ECF No. 309 at 2 (in first page of motion for jurisdictional discovery against Porsche AG, referencing Plaintiffs' opposition for relevant background and argument).

7. Given the overlap between Plaintiffs' filings, Porsche AG and BMW AG's replies in support of their motions to dismiss and oppositions to Plaintiffs' motions for jurisdictional discovery will likely overlap as well.

8. Thus, Porsche AG and BMW AG request to file their replies in support of their motions to dismiss and their oppositions to Plaintiffs' motions for

jurisdictional discovery on the same date: **February 28, 2025**. This is the date that Porsche AG and BMW AG's replies are due, and it would represent only a one-week extension of their time to file oppositions to Plaintiffs' motions for jurisdictional discovery.

9. Plaintiffs do not oppose this one-week extension. *See* Ex. A at 1.

10. Because this extension would provide Porsche AG and BMW AG an extra week to respond to Plaintiffs' motions for jurisdictional discovery, the parties agreed that Plaintiffs should also receive an extra week to reply in support of same. *See id.*

11. Accordingly, Plaintiffs' deadline to file replies in support of their motions to take jurisdictional discovery should be **March 21, 2025**. *See* L.R. 7.1(B).

12. By filing this Motion, neither Porsche AG nor BMW AG waive any defenses. *See* Fed. R. Civ. P. 12(h).

**WHEREFORE**, Specially Appearing Defendants Porsche AG and BMW AG respectfully request that the Court extend their deadline to respond to Plaintiffs' motions for jurisdictional discovery until February 28, 2025.

Dated: February 18, 2025

/s/ Eric Y. Kizirian

Eric Y. Kizirian  
Zourik Zarifian  
633 W. Fifth Street, Suite 4000  
**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**  
Los Angeles, CA 90071  
Eric.Kizirian@lewisbrisbois.com  
Zourik.Zarifian@lewisbrisbois.com

*Attorneys for Specially Appearing  
Defendant BMW AG*

Respectfully submitted,

/s/ Matthew A. Goldberg

Matthew A. Goldberg  
Nathan P. Heller  
Timothy P. Pfenninger  
**DLA PIPER LLP (US)**  
1650 Market Street, Suite 5000  
Philadelphia, PA 19103  
Matthew.Goldberg@dlapiper.com  
Nathan.Heller@dlapiper.com  
Timothy.Pfenninger@dlapiper.com

*Attorneys for Specially Appearing  
Defendant Porsche AG*

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rules 5.1 and 7.1, I certify that the foregoing document was prepared using Times New Roman 14-point font.

Date: February 18, 2025

/s/ Matthew A. Goldberg  
Matthew A. Goldberg

**CERTIFICATE OF SERVICE**

I certify that, on February 18, 2025, the foregoing document was served on all counsel of record via the court's CM/ECF e-filing system.

/s/ Matthew A. Goldberg  
Matthew A. Goldberg